REMARKS

Claims 1-15 are pending in the present patent application. Claims 1-15 stand rejected. By this Amendment, claims 1-3 are amended. This application continues to include claims 1-15.

Claims 1-5 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Specifically, the Examiner asserts that it is unclear what the Applicants mean by "satellite" in claim 1.

Applicants respectfully disagree with the Examiner that the term, "satellite server," is ambiguous for at least the reasons set forth in Applicants' Response mailed August 20, 2004, which is incorporated herein by reference. In particular, the term, "satellite", used in the context of a "satellite server", is clearly defined in Applicants' specification and is thus definite. (See, for example, Applicants' specification from page 4, line 29 to page 5, line 4.)

Notwithstanding the above, in order to expedite prosecution of the present application, and to put the present application in condition for allowance, Applicants have amended claims 1-3 to replace the term, "satellite server" with "input source server", which is supported by Applicants' specification at page 4, line 29 to page 5, line 4. Applicants thus request that the Examiner withdraw the rejection of claims 1-5 under 35 U.S.C. §112, second paragraph.

Claims 1-5 and 12-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Rourke, et al., U.S. Patent No. 5,995,721 (hereinafter, Rourke). Applicants request reconsideration of the rejection of claims 1-5 and 12-15 in view of the following.

Rourke is directed to a system which examines the attributes of a document for the purpose of delivering one or more portions of the document to one or more of the document processing subsystems on the basis of the examination of the attributes (col. 1, lines 9-13). A

processing system 10 includes a plurality of printers 12-1, 12-2, 12-3, . . . 12-n for processing print jobs and making prints in accordance with the job programming instructions for each job printed (col. 6, lines 45-48). Processing system 10 provides print processing for various workstations or clients 15-1, 15-2, 15-3, . . . 15-n, which may be remote and/or on site, are operatively coupled to printers 12-1, 12-2, 12-3, 12-n through server 25 (col. 6, lines 60-64). Clients 15-1, 15-2, 15-3, . . . 15-n provide the electronic documents that are the source of the print jobs and for this purpose individual ones or all of clients may have a document scanner, disk input, keyboard, fax, etc. for generating the electronic documents that comprise the job to be printed (col. 7, lines 2-7). Clients 15-1, 15-2, 15-3, . . . 15-n include a User Interface 16 enabling programming selections for print jobs to be made in the form of an electronic job ticket 35 that allows a user to program a print job for transmission to server 25 (col. 7, lines 7-20).

Thus, Rourke essentially discloses clients 15-1 . . . 15-n that generate electronic documents using keyboards, scanners, faxes, to create a print job in the form of a job ticket that allows the user to transmit the print job to server 25 for printing on printers 12-1, etc.

Applicants believe that claims 1-5 and 12-15 patentably define Applicants' invention over Rourke for at least the reasons set forth below.

For brevity, Applicants hereby incorporate herein by reference their arguments set forth in the previous Response mailed August 20, 2004.

Claim 1 is directed to a server system for a document processing system. Claim 1 recites, in part, a plurality of input source servers connected to said input sources, said input source servers being configured to receive a plurality of digital files from said input sources; and a central server connected to said input source servers, said central server being configured to

receive said digital files from said input source servers and perform at least one action on at least one of said digital files.

Applicants submit that Rourke does not disclose, teach, or suggest the above-recited subject matter of claim 1. In contrast to claim 1, Rourke narrowly discloses a print server system that allows for only print processing, as opposed to the document processing system of claim 1 that allows for emailing, printing, faxing, and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4), thus performing multiple operations on the document, and introducing it into the workflow process of a business (see Applicants' specification at page 1, lines 18-19). For example, Rourke merely discloses clients 15-1, etc. that generate electronic documents using keyboards, scanners, faxes, and create a print job in the form of a job ticket that allows the user to transmit the print job to server 25 via electronic job ticket 35 for printing on printers 12-1, etc.

In addition, in contrast to claim 1, as set forth above, Rourke discloses that clients 15-1, etc. generate electronic documents using keyboard, scanners, faxes, etc. Then, clients 15-1, etc., are used to program print jobs using user interface 16 of clients 15-1, etc., (col. 7, lines 7-20) and to transmit the print jobs to server 25 via an electronic job ticket 35 for printing by printers 12-1, etc. Therefore, rather than a plurality of *input source servers* being configured to receive a plurality of digital files *from input sources*, and a *central server connected to the input source servers*, the central server being configured to receive the digital files from the input source servers, not from the input sources, Rourke merely discloses that clients 15-1, etc. generate print jobs that are transmitted to server 25 via an electronic job ticket 35.

Stated differently, for example, Applicants claimed invention is a 3-tier system having one source tier and two server tiers, whereas Rourke discloses a 2-tier system having one source tier

and one server tier. For example, the first tier of Applicants' invention are the input sources recited in claim 1, the second tier of Applicants' invention are the input source servers that receive the digital files from the input sources, and the third tier of Applicants' invention is the central server that receives the files from the input source servers. Because Applicants' second tier are servers, it is possible that the input sources may include other computers, such as personal computers (see Applicants specification at page 2, lines 26-28).

In contrast, Rourke's 2-tier system employs the clients 15-1, etc., that generate print jobs as a first tier, and the print jobs are provided to the printers via the second tier, which is server 25. Rourke discloses as input to clients 15-1 a scanner, keyboard, disk input, fax, etc., each of which are known in the art to be peripheral devices that operate via the computer to which they are attached. However, Rourke does not disclose, teach, or suggest that clients 15-1, etc., receive input from other computers that are acting in the capacity of servers or that clients 15-1, etc., otherwise function as servers.

Although Rourke discloses that multiple servers may be used in place of server 25, as many servers may be used as required to meet the demands of users, Rourke does not disclose, teach, or suggest that the "many servers" will all send the print jobs to be received by a central server.

The Examiner acknowledges that Rourke does "not explicitly teach satellite servers [input source servers] or a central server", but asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention "to be motivated to interpret and/or employ a central server in conjunction with Rourke, since Fig. 1 illustrates one main server (**central server**) to which the clients must connect in order to fulfill their print job requests" (underscore added; bold in original).

However, MPEP 2143 provides that the Basic Requirements of a Prima Facie Case of Obviousness requires that the prior art reference (or references when combined) must teach or suggest all the claim limitations (MPEP rev. 2, May 2004, page 2100-129, emphasis added). Under MPEP 2143, the Examiner may not insert into the prior art a limitation under principles of obviousness so as to reject Applicants' claim, but rather, where "all the claim limitations" are not taught or suggested, a prima facie case of obviousness has not been established.

Although in the Response to Arguments, the Examiner acknowledges that a client and a server perform different functions, the Examiner asserts that the same computer can perform both the functions of a client and a server. Even if true, however, Rourke simply does not disclose, teach, or suggest that the asserted computer, Rourke client workstations 15-1, etc, perform the functions of a server or acts in the capacity of a server, but rather, clearly discloses that workstations 15-1, etc., are clients. The Rourke computer that is disclosed by Rourke to be a server is server 25, but not "workstations or clients 15-1," etc.

In addition, Applicants submit that a *prima facie* case of obviousness has not been established under MPEP 2142 (Rev. 2, May 2004, Page 2100-128, left column), which requires that there must be suggestion or motivation to modify the reference, and that the Examiner must provide a "suggestion of the desirability of doing what the inventor has done" (MPEP 2142, Rev. 2, May 2004, Page 2100-128, right column).

However, the Examiner has not provided any such suggestion or motivation. Although the Examiner makes generalized statements pertaining to the use of servers (bottom of page 3 of Detailed Action), such statements simply do not provide a stimulus to action, an emotion or desire operating on the will and causing it to act, an inducement to perform a thing, etc., such as might constitute a motivation to modify the Rourke clients 15-1, etc., to become servers.

For instance, the Examiner asserts that "it would have been obvious to one of ordinary skill in the art at the of time the invention to be motivated to interpret and/or employ a central server in conjunction with Rourk, et al. since Fig. 1 illustrates one main server (**central server**) to which the clients must connect in order to fulfill their print job requests. As for the **satellite servers** [input source servers] the *clients* mentioned in the teachings of Rourke et al. can be interpreted as such servers, since it is well known that servers can function as clients and clients as servers." (Emphasis in original).

However, the assertions that "since Fig. 1 illustrates one main server (**central server**) to which the clients must connect in order to fulfill their print job requests" and that "the *clients* mentioned in the teachings of Rourke et al. can be interpreted as such servers, since it is well known that servers can function as clients and clients as servers" are merely assertions as to the existence of particular facts, and do not provide a stimulus to action, an emotion or desire operating on the will and causing it to act, an inducement to perform a thing, such as might constitute a motivation to modify Rourke to achieve Applicants' claimed invention, much less the desirability of doing so.

MPEP 2142 provides that

> To support the conclusion that the claimed invention is directed to obvious subject matter, *either* the references must expressly or impliedly suggest the claimed invention *or* the Examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. (MPEP 2142, Rev. 2, May 2004, Page 2100-128, right column)(emphasis added).

However, the above-quoted assertions by the Examiner clearly do not indicate that Rourke disclosure "expressly or impliedly suggest the claimed invention," and are not a convincing line

of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of Rourke.

Rourke simply does not disclose, teach, or suggest input source servers and a central server, as recited in claim 1, and it would not have been obvious to modify Rourke so as to incorporate input source servers and a central server so as to duplicate Applicants' claimed invention.

Accordingly, for at least the reasons set forth above, Applicants submit that claim 1 is allowable in its present form.

Claims 2-5 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 1. In addition, claims 2-5 further and patentably define the invention over Rourke.

For example, claim 3 (as amended) is directed to the server system of claim 2, wherein said input source servers are configured to pass the accumulated jobs to said central server during at least one off-peak time period. Applicants submit that Rourke does not disclose, teach, or suggest wherein the input source servers are configured to pass the accumulated jobs to the central server during at least one off-peak time period.

The Examiner acknowledges that Rourke does not explicitly disclose an off-peak time period, but asserts that it would have been obvious to one of ordinary skill in the art at the time of Applicants' invention. However, because the claim 3 limitation, "off-peak time period", is not taught or suggested by Rourke, claim 3 is not obvious with respect to Rourke, according to MPEP 2143, as set forth above.

In addition, the Examiner does not provide the required motivation to modify Rourke, as required by MPEP 2142. Rather, the Examiner simply states that Rourke contemplates the use of

as many servers and document processing units as required to meet the demands of the users, and that the skilled artisan can interpret that the invention of Rourke would only need to employ the one server during an off-peak time period, since the demands of the users would be extremely low.

However, the assertion that Rourke contemplates as many servers and document centers as required to meet the demands of the users has no bearing on and does not disclose, teach, or suggest any of the limitations pertaining to accumulated jobs, a central server, or an off-peak time period, much less passing the accumulated jobs to a central server during at least one off-peak time period, as recited in claim 3.

In addition, whether a skilled artisan can interpret that Rourke would only employ one server, as asserted by the Examiner, simply does not disclose, teach, or suggest passing the accumulated jobs to a central server during at least one off-peak time period. Rourke simply does not disclose, teach, or suggest employing a central server during an off-peak time period, and the asserted rationale for modifying Rourke simply does not provide a stimulus to action, an emotion or desire operating on the will and causing it to act, an inducement to perform a thing, such as might constitute a motivation to modify Rourke to achieve Applicants' claimed invention, much less the desirability of doing so.

Further, in the Response to Arguments, the Examiner asserted that "it should be noted that the term off peak period has a well established meaning within the art. Furthermore, the invention of Rourke et al. adjusts its work load to accommodate high demand situations, e.g., high or on peak time period, by imploring more servers to meet users' demands; therefore the invention of Rourke et al. will always provide the requests for its users regardless of the time they are made."

Applicants submit that such an assertion does not address the fact that Rourke does not disclose, teach, or suggest passing the accumulated jobs to a central server during at least one off-peak time period, as recited in claim 3. In addition, whether or not the term, "off-peak period," has a well established meaning within the art does not in any way support the assertion that Rourke discloses the limitation of an "off-peak period."

Further, the assertion that Rourke "adjusts its work load to accommodate high demand situations" "by imploring more servers to meet users' demands," is not supported by the relied-upon Rourke passage at column 6, line 65 to column 7, line 2. Rourke does not disclose, teach, or suggest adjusting its workload to accommodate high demand situations. In fact, the Rourke disclosure does not even employ the word "adjust," "adjusts," "implore," or "imploring." Rather, the relied-upon passage of Rourke simply provides that as many servers and document processing units may be used as required to meet the demands of users. Thus, if a particular Rourke system had higher demands from users than another Rourke system, that particular Rourke system might be configured to incorporate more servers and document processing units than the other Rourke system.

Accordingly, the relied-upon passage simply does not support an "adjustment" aspect, much less the assertion that the number of servers would vary as between peak and off-peak periods so as to adjust the amount of servers (and hence document processing units) available for use, or that the Rourke system "implores" more servers to meet demands. Instead, such assertions are unsupported by Rourke.

Accordingly, claim 3 is believed allowable in its own right.

Claim 12 is directed to a server system for a document processing system, said server system comprising a server configured to perform a plurality of operations on a single digital file.

The Examiner rejected claim 12 "along the same rationale" as claim 1. In rejecting claim 1, the Examiner relied on Rourke for the proposition that Rourke suggested "satellite servers [input source servers]" and a "central server", as recited in claim 1. However, claim 12 does not recite either "satellite servers [input source servers]" or a "central server." Further, claim 12 is directed to different subject matter than claim 1, is of a different scope than is claim 1, and employs different language than does claim 1. For example, claim 12 recites a server configured to perform a plurality of operations on a single digital file, a limitation that is not recited in claim 1. Hence the rejection of claim 1 has no bearing on claim 12, and thus, the rejection of claim 12 "along the same rationale" as claim 1 does not address the limitations of claim 12 that are not present in claim 1.

In addition, Rourke simply does not disclose, teach, or suggest a server system for a document processing system, said server system comprising a server configured to perform a plurality of operations on a single digital file, as recited in claim 12, nor does the Examiner assert as much. Rather, Rourke discloses only that a server that performs a single function on a print job, that is, routing the print job to one or more printers for printing (col. 7, lines 15-22, Fig. 2).

Since Rourke does not disclose, teach, or suggest the all claim 12 limitations, for example, a server configured to perform a plurality of operations on a single digital file, as recited in claim 12, a *prima facie* case of obviousness of claim 12 has not been established under MPEP 2143, and hence the rejection of claim 12 is improper, and it is respectfully requested that rejection of claim 12 be withdrawn.

Accordingly, for at least the reasons set forth above, Applicants submit that claim 12 is allowable in its present form.

Claims 13-15 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 12.

Accordingly, for at least the reasons set forth above, Applicants respectfully request that the rejection of claims 1-5 and 12-15 under 35 U.S.C. 103(a) be withdrawn.

Claims 6-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Senn, et al., U.S. Patent No. 6,151,610 (hereinafter, Senn). Applicants request reconsideration of the rejection of claims 6-11 in view of the following.

Senn is directed to the representation and manipulation of documents on a display device, for example, using a scripting language, to keep a system open to commands at all times so as to prevent a "busy" cursor on a computer (col. 1, lines 11-12, and lines 25-30). The Senn summary discloses a document management apparatus that has a scripting language that controls documents by setting the attributes of documents, wherein attributes are pieces of data within a document (col. 1, lines 33-35). Documents are stored in a repository (col. 6, line 56). A user may retrieve documents from different repositories (col. 7, lines 17-18). A repository server serves the documents to clients, and includes a search engine and an interface to process search requests (col. 7, lines 37-42). The scripts are used to control the renderer of the document (col. 11, lines 27-40).

Applicants believe that claims 6-11 patentably define Applicants' invention over Senn, for at least the reasons set forth below.

Applicants hereby incorporate by reference their arguments set forth in their previous Response mailed August 20, 2004.

Applicants submit that Senn is not analogous art under MPEP 2144.01(a), and hence, may not be relied upon in rejecting Applicants' claims (MPEP rev. 2, May 2004, page 2100-122). In particular, the function and structure of Applicants' invention are dissimilar to that of Senn.

For example, Applicants' invention is directed generally to a server system for automatic multiple action document processing (Applicants' specification at page 1, lines 1-2), wherein the server system takes input from a variety of sources such as scanners, remote client personal computers, and other hardware devices, and the document is submitted once and a job selected, which causes the server to perform multiple actions (Applicants' specification at page 1, lines 23-27), wherein the actions pertain to, for example, emailing, printing, faxing, and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

In contrast, Senn is directed to the representation and manipulation of documents on a display device, for example, using a scripting language, to keep a system open to commands at all times so as to prevent a "busy" cursor on a computer (col. 1, lines 11-12, and lines 25-30), which is completely unrelated to Applicants' invention.

In addition, the PTO classifications of the present invention and Senn are not the same. For example, the U.S. Current Class of Applicants invention 718/105, whereas the Senn class is 707/516, a classification that is clearly different that than of the present application.

Accordingly, Senn is not analogous prior art as required under MPEP 2144.01, and Applicants thus request that the rejection of claims 6-11 be withdrawn.

Notwithstanding the above, claim 6 is directed to a method of processing a digital file. Claim 6 recites, in part, building a job object including a plurality of action objects, and performing the action objects on the digital file. The action objects pertain to emailing, printing,

faxing, and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4), wherein the job object may cause multiple operations, e.g., emailing, printing, faxing, and/or converting the document to another format, to be performed on the document. Applicants submit that Senn does not disclose, teach, or suggest building a job object including a plurality of action objects, and performing the action objects on the digital file. In contrast to claim 6, Senn merely discloses that attributes of a document are set by scripts (col. 1, lines 33-35), and that the scripts are used to control the renderer of the document (col. 11, lines 27-40).

The Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention to "use the invention of Senn to provide for **building a job object including a plurality of action objects; and performing the action objects on the digital file**, since the skilled artisan would interpret *setting the attributes of a document* as a **job object** and the *processes to accomplish it* as a **plurality of action objects**." (Emphasis in original). Applicants respectfully disagree, and challenge the assertions as not being properly officially noticed and not being properly based upon common knowledge under MPEP 2144.04. Accordingly, Applicants' request the Examiner to support the assertion with adequate evidence (MPEP rev. 2, May 2004, page 2100-138).

For example, Applicants contend that a skilled artisan would not interpret setting the attributes of a document as a job object and the processes to accomplish it as a plurality of action objects, as asserted by the Examiner. For example, the Senn "attributes" have nothing to do with action objects that pertain to, for example, emailing, printing, faxing, and/or converting the document to another format, each of which may be performed on a given document (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

Rather, the Senn "attributes" pertain to displaying a document on a computer monitor. For example, an "attribute," as defined by Senn, is a piece of data stored in a document (col. 2, line 49), and can be modified by a script (col. 2, line 60). In Senn, attributes describe the display of the document in a 3-dimensional visual workspace, for example, the X, Y, and Z positions (col. 4, lines 18-27). In addition, ephemeral attributes define the display characteristics of the associated document, such as position and size, and reflect the actions of the user in manipulating the screen object of a document within a workspace, typically through using an interface device such as a mouse (col. 5, lines 22-25). An intrinsic attribute, is a special ephemeral attribute that every document must have, which directly effects the display of the screen object (col. 5, lines 43-45).

Thus, "attributes" in Senn are data that pertain to the display of a document in a workspace, and have no bearing on and do not disclose, teach, or suggest building a job object including a plurality of action objects, and performing the action objects on the digital file, as recited in claim 6, wherein a job object including one or more action objects pertains to, for example, emailing, printing, and faxing and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

Since Senn does not disclose, teach, or suggest the all claim 6 limitations, for example, building a job object including a plurality of action objects, and performing the action objects on the digital file, as recited in claim 6, a *prima facie* case of obviousness of claim 6 has not been established under MPEP 2143.

In addition, the Examiner has not provided a motivation to modify Senn to achieve Applicants' invention of claim 6, as required by MPEP 2142.

For example, in the Response to Arguments, the Examiner acknowledges that Senn does not teach a job object or an action object, but asserts that one skilled in the art would be motivated

to rely on Senn to provide for a job object or action objects, since setting attributes of a document is a job that is performed by the system using a scripting language and involves many processes to accomplish it, which are performed by a plurality of action objects.

However, there would be no motivation for modifying a system for representing and manipulating documents on a display device so as to prevent a "busy" cursor, as taught by Senn (col. 1, lines 11-12, and lines 25-30), to achieve Applicants' invention of building a job object including a plurality of action objects, and performing the action objects on the digital file, as recited in claim 6. Such action objects pertain to, for example, emailing, printing, faxing, and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

In addition, the assertion that one skilled in the art would be motivated to rely on Senn to provide for a job object or action objects, since setting attributes of a document is a job that is performed by the system using a scripting language and involves many processes to accomplish it, which are performed by a plurality of action objects, simply does not provide a stimulus to action, an emotion or desire operating on the will and causing it to act, an inducement to perform a thing, etc., as might constitute a motivation to modify Senn in order to achieve Applicants' invention, but rather, is merely an assertion as to how certain processes may be performed.

Still further, the motivation asserted by the Examiner in the Response to Arguments, which is that the skilled artisan is well aware of the concept of a job ticket to which the benefit of grouping attributes and directions or scripts into a single object is analogous, also does not provide a stimulus to action, an emotion or desire operating on the will and causing it to act, an inducement to perform a thing, etc., as might constitute a motivation to modify Senn in order to

achieve Applicants' invention, but rather is merely an assertion of knowledge of the skilled artisan.

Accordingly, for at least the reasons set forth above, Applicants submit that claim 6 is in condition for allowance in its present form.

Claims 7-11, are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 6. In addition, claims 7-11 further and patentably define the invention over Senn.

For example, claim 7 is directed to the method of claim 6, wherein said building step is performed by a parser. Applicants submit that Senn does not disclose, teach, or suggest the building step, much less a building step performed by a parser, as recited in claim 7. As set forth in Applicants' previous Response, the relied upon Senn language does not address what steps are performed by the asserted parser, much less a building step, or the building step being performed by a parser, as recited in claim 7. Rather, the relied-upon Senn passage at column 3, lines 19-25 merely provides for determining if an attribute is a script, and if so, determining what interpreter to use in interpreting the script.

In the Response to Arguments, the Examiner interprets the Senn "script interpreter" as a parser. However, even with such an interpretation, Senn simply does not disclose, teach, or suggest that the "script interpreter" performs a building step, as recited in claim 7, which is building a job object including a plurality of action objects. For example, the relied-upon Senn passage, column 3, lines 19-25, provides that "an identifier process can be designed and used to determine whether the value of an attribute is script, and also what script interpreter is needed to interpret it. The identifier process does not test whether the script can be properly parsed, but upon determining that the value of an attribute is script, chooses which script interpreter to call to

interpret the script." (Emphasis added). This relied-upon Senn passage simply does not disclose, teach, or suggest a parser building a job object including a plurality of action objects, but rather, merely identifies whether the value of an attribute is a script, and chooses a script interpreter to interpret the script, without even determining whether the script can be parsed.

Accordingly, claim 7 is believed allowable in its own right.

Claim 10 is directed to the method of claim 6, wherein said performing step includes assigning said action objects to individual worker threads. Senn clearly does not disclose, teach, or suggest assigning action objects to individual worker threads, as recited in claim 10.

In rejecting claim 10, the Examiner relies on Senn at column 33, lines 10-14, which is reproduced as follows: "Locals are containers that exist only for the duration of a thread of execution and are local to that thread. Since threads often execute in parallel in the scripting language, it is usually appropriate to use locals to store temporary results within a thread." Storing temporary results within a thread, as disclosed by Senn, without regard to the Office interpreting "locals" as action objects and "a thread of execution" as an individual worker thread, as set forth in the Response to Arguments, does not disclose, teach, or suggest assigning action objects to individual worker threads, wherein the action objects pertain to, for example, emailing, printing, faxing, and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4). Rather, the asserted Senn language is merely a reference to storing data in a thread, and has nothing to do with assigning action objects to individual worker threads.

Accordingly, claim 10 is believed allowable in its own right.

Accordingly, for at least the reasons set forth above, Applicants respectfully request that the rejection of claims 6-11 under 35 U.S.C. 103(a) be withdrawn.

For the foregoing reasons, Applicants submit that the pending claims are definite and do particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants believe that claims 1-15 are in condition for allowance in their present form, and it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

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